

JOSHUA A. SLIKER, ESQ.
Nevada Bar No. 12493
JACKSON LEWIS P.C.
300 S. Fourth Street, Suite 900
Las Vegas, Nevada 89101
Telephone: (702) 921-2460
Facsimile: (702) 921-2461
Email: joshua.sliker@jacksonlewis.com

JACQUELYN L. THOMPSON, ESQ.
(*pro hac vice*)
DC Bar No. 988663
FORDHARRISON LLP
2000 M Street, NW, Suite 505
Washington, DC 20036
Telephone: (202) 719-2064
Email: jthompson@fordharrison.com

*Attorneys for Defendant
Allegiant Air, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ALI BAHREMAN,

Plaintiff,

v.

ALLEGiant AIR, L.L.C. and
TRANSPORT WORKERS UNION OF
AMERICA LOCAL 577,

Defendants.

Case No. 2:20-cv-00437-ART-DJA

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE
DISPOSITIVE MOTIONS AND JOINT
PRETRIAL ORDER**

[FOURTH REQUEST]

Pursuant to Local Rules IA 6-1 and Local Civil Rules 7-1 and 26-3, Plaintiff Ali Bahreman (“Bahreman”) and Defendants Allegiant Air, LLC (“Allegiant”) and the Transport Workers Union of America, Local 577, AFL-CIO (“TWU”) (collectively the “Parties”), by and through their counsel of record, hereby stipulate to extend the time to file dispositive motions and the joint pretrial order. This is the Parties’ fourth request for an extension.

1 On April 27, 2022, the Court granted Defendants' Motion for Extension of Time to File
2 Dispositive Motions (ECF No. 68). On May 5, 2022, the Court granted Plaintiff's Motion for
3 Extension of Time to File Dispositive Motions (ECF No. 70). Pursuant to the Court's Orders, the
4 deadline for filing dispositive motions after initial discovery is June 15, 2022 and the time for filing
5 the joint pretrial order is July 15, 2022 (or 30 days after dispositive motions are decided). It is at
6 least 21 days before the expiration of the subject deadlines.

7 Since the Court granted the Parties' third requests for extensions of time, the Parties have
8 been actively engaged in settlement discussions in hopes of resolving this case without the need to
9 file dispositive motions. Settlement discussions have progressed and are ongoing, and the Parties
10 seek additional time to engage in further settlement discussions. An extension will allow the Parties
11 to engage further in substantive settlement discussions and potentially resolve the case without the
12 need to file dispositive motions unnecessarily.

13 Bahreman's lead counsel also has a week-long trial scheduled in *Carter v. Southwest*
14 *Airlines Co., et al.*, 3:17-cv-2278, in the Northern District of Texas, on the Court's two-week docket
15 beginning July 5, 2022, with pre-trial deadlines scheduled throughout June 2022. A sixty (60) day
16 extension will allow Bahreman to prepare and file dispositive motions in a timely manner if the
17 Parties determine they cannot reach settlement.

18 Accordingly, the Parties propose a sixty (60) day extension of time to file dispositive
19 motions from June 15, 2022, up to and including August 15, 2022, and the joint pretrial order from
20 July 15, 2022, up to and including September 14, 2022 (or 30 days after dispositive motions are
21 decided). The additional sixty (60) days will allow the Parties to determine whether settlement can
22 be reached, and if not, to prepare dispositive motions in a timely manner.

23 This will preserve party and judicial resources and avoid unnecessary motion practice. The
24 Parties request to extend the deadline in good faith and not for the purposes of undue delay. They
25 have only requested the amount of additional time they deem necessary for determining whether
26 settlement can be reached, and if not, the completion of motions practice in this matter. Thus, the
27 Parties believe good cause exists for extending the above-described deadlines.

